City of Seattle

Gregory J. Nickels, Mayor

Department of Information Technology
Bill Schrier, Director and Chief Technology Officer

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Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

To Whom It May Concern:

The City of Seattle is pleased to have this opportunity to provide comments on the spectrum needs of emergency response units (WT Docket No. 05-157). The greater Seattle area is the largest urban area in Washington State and has grown from a population of 1,939,000 in 1970 to 3,275,847 in 2000.

The City of Seattle and King County currently use 800 MHz for public safety voice communication. The City of Seattle uses a third party commercial provider for data services.

The data services provided by the third party are expensive. The services have a minimum bandwidth of 20 kilobits per second (kbps), and a maximum of just over 100kbps. The third party service is not designed for high throughput applications or high capacity, large-scale emergencies. Therefore, public safety services cannot be a priority on the third party service. In addition, the third party service is not a trusted information network.

Interoperable communications is a major focus for homeland security. The Seattle Urban area is one of only seven urban areas, nationally, which have received money in every one of the four Urban Area Security Initiative (UASI) funding cycles. The next round of UASI funding will place major emphasis on interoperable communications far beyond voice radio networks: high-speed data communications, voice-over-IP and video. These requirements will far exceed the current data service infrastructure provided by third party commercial providers.

Seattle needs wireless networking which supports propagation through buildings, real time video, large file transfers, enhanced mission-specific (police, fire, utility) applications, special geographical (map-based) presentations, simplified user interfaces, and use of voice over IP (VOIP) for interoperability and redundancy.

With these penetration, speed, priority, capacity, and security objectives, a standards-based network design will need allocation of 30 MHz bandwidth within the 700 MHz band

to sufficiently meet the known requirements for emergency and disaster preparedness, including response to terrorist and homeland security incidents.

The business benefits include: a secure, trusted information network, reduced long term costs, long term sustainability, interoperability across public safety jurisdictions, meeting the national strategy for dedicated broadband networking, lower cost of deployment compared to higher frequencies, and insuring embedded capacity for large scale emergencies.

We recognize that hurdles exist: use of standards-based technology (rather than proprietary ones), constant development of new wireless technologies and the need for multi-jurisdictional interoperability agreements. These can be overcome with a reasonable strategy and dedicated spectrum. Therefore, we encourage the Commission to pursue rule modifications for the reallocation of 30 MHz in the commercial 700 MHz band for first responders.

Sincerely,

Bill Schrier
Chief Technology Officer